U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Portage Creek Area - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #15**
Progress
Portage Creek Area
059B05
Kalamazoo, MI
Latitude: 42.2839750 Longitude: -85.5791570

To: Sam Borries, U.S. EPA
Jason El-Zein, U.S. EPA
John Maritote, U.S. EPA
Mike Ribordy, U.S. EPA
Mark Mills, Michigan DNR
Daria Devantier, MDEQ
Paul Bucholtz, MDEQ
Bruce Merchant, Kalamazoo City
Debbie Jung, Kalamazoo City
Lisa Williams, U.S. FWS
Todd Goeks, NOAA
Valencia Darby, Department of Interior
Mark Johnson, ATSDR

From: Craig Thomas, On-Scene Coordinator
Date: 8/3/2012
Reporting Period: 7/20/2012 - 8/3/2012

1. Introduction

1.1 Background

Site Number:	059B05	**Contract Number:**	EP-S5-09-05
D.O. Number:	0087	**Action Memo Date:**	7/5/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	05
Mobilization Date:	9/26/2011	**Start Date:**	8/30/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	MID006007306	**RCRIS ID:**	NA
ERNS No.:	NA	**State Notification:**	Yes
FPN#:	NA	**Reimbursable Account #:**	NA

1.1.1 Incident Category
Fund-lead removal action

1.1.2 Site Description
See POLREP #1

1.1.2.1 Location
See POLREP #1

1.1.2.2 Description of Threat
See POLREP #1

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
See POLREP #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative
Dredging operations in Axtell Creek were delayed by high PCB test results at the target excavation depths (see Sections 2.1.2, 2.2 and 2.2.2). Dredging will contine on August 8 once the groundwater dewatering system has had sufficient operational time to capture groundwater. Crews began preparations for excavation in SA5-D and SA5-C (Upjohn Park). A creekwater bypass pump system, groundwater dewatering system, and temporary bridge were installed to facilitate contaminated sediment removal operations. Remaining excavated sediments from Axtell Creek were further solidified on the staging pad and shipped for disposal at designated landfills.

2.1.2 Response Actions to Date
From July 21 to August 3, EPA, START and ERRS contractors/sub-contractors conducted the following activities:

Site Activities - Axtell Creek
- Completed post-excavation sampling for the initial over-excavation depths in grids AXC-1 thru AXC-5 to determine if cleanup goals were met. Only the sample result from grid AXC-5 met the performance standard of 10 mg/kg PCBs. None of the confirmatory sample results from any of the grids met the performance standard goal of 1 mg/kg PCBs. Based on these results, additional core sampling was conducted (see Section 2.2.2) and additional PCB-contaminated material was identified. All grids will undergo a second over-excavation (see details in Section 2.2). Grids AXC-1 through AXC-5 are estimated (est) to be over excavated as follows once the de-watering system is installed:

GRID	TOTAL EXCAVATION DEPTH (in)	TERTIARY CONFIRMATION PCB RESULT (mg/kg)
AXC-1	60 (est)	TBD
AXC-2	66 (est)	TBD
AXC-3	60 (est)	TBD
AXC-4	66 (est)	TBD
AXC-5	36 (est)	TBD

- Completed installation of groundwater de-watering system around perimeter of excavation;
- Began construction of a 12" discharge pipeline from the John Street pump station to Vine Street to prevent Axtell Creek discharge from filling SA5-D and SA5-C excavation areas in Portage Creek and enhance existing pump capacity to handle extreme rain events;
- Pumped and treated contaminated contact water in AXC-2 to AXC-4 in EPA's mobile wastewater treatment system; and
- Conducted personnel air monitoring, stream turbidity, and perimeter particulate monitoring in work areas with all results below action levels.

Site Activities - Staging Pad
- Solidified and loaded out 511.87 tons of TSCA (> 50ppm PCBs) contaminated sediments for disposal at Wayne Disposal landfill in Belleville, Michigan;
- Solidified and loaded out approximately 421.67 tons of non-TSCA (< 50ppm PCBs) contaminated sediments for disposal at C&C Landfill in Marshall, Michigan; and
- Treated 140,415 gallons of contaminated contact water in EPA's mobile wastewater treatment plant, with a total of 378,678 gallons treated to date.

Site Activities - SA6
- Spread topsoil, grass seed and straw on the top of the creek banks and impacted adjacent properties;
- Began installation of new fencing on the west bank which was removed to facilitate contaminated sediment

removal; and
- Installed new fencing at two properties on the east bank which was removed to facilitate installation of the 30" bypass pump system disharge line.

Site Activities - SA5-D & SA5-C
- Completed installation of temporary fencing around work area on east bank;
- Installed and tested creek bypass pumping system at Lake Street bridge;
- Constructed two 18" discharge lines on west bank from Lake Street pump station to Vine Street to handle discharge from creek bypass pumping system;
- Began installation of groundwater dewatering system; and
- Installed temporary steel bridge to facilitate transport of excavated sediments to staging pad without using public roadways.

Project Management Activities
- Continued weekly progress meetings with City of Kalamazoo;
- Awarded contract to implement restoration plans for SA5, SA6, and SA7;
- Awarded contract to re-pave or fix damaged asphalt in paved lots used to access SA6; and
- Conducted data validation for post-removal confirmation sediment samples and investigatory cores collected from Axtell Creek.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
The major PRP for this portion of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund site was dissolved through bankruptcy proceedings in April 2010. Other PRPs are being evaluated.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
TSCA contaminated sediments	solidified sediment	511.87 tons	009952872JJK to 009952882 JJK	disposal	Wayne Disposal, Belleville, MI
Non-TSCA contaminated sediments	solidified sediment	421.67 tons (est)	NTSCA-79 to NTSCA-87	disposal	C&C Landill, Marshall MI
Scrap metal	steel	1240 lbs		recycling	Shupan Industrial Recycling, Kalamazoo, MI
Plastic	bottles	100 lbs	none	recycling	Best Way Disposal, Kalamazoo, MI
Wooden shipping pallets	solid	100	none	dismantlement reuse	Holland Pallet, Kalamazoo, MI

2.2 Planning Section

A summary of removal activities that will take place from August 6 through August 17 include:

Site Activities - Axtell Creek
- Complete overexcavation, backfilling and restoration of creek channel and banks;
- Complete tertiary confirmatory sampling at excavation bottom in AXC-1 to AXC-5;
- Complete construction of a 12" pipeline to support creek bypass pumps at John Street and discharge at Vine Street; and
- Conduct personnel air monitoring, stream turbidity, and perimeter particulate monitoring in work areas.

Site Activities - Staging Pad
- Complete de-watering and solidification of excavated sediments for transport;
- Complete transport of solidified sedments for disposal; and

- Continue treatment of contaminated water in EPA's mobile waste water treatment plant.

Site Activities - SA5-D
- Complete installion of groundwater de-watering system between Lake Street and Axtell Creek;
- Install fencing around Lake Street pumping station, west bank between Axtell Creek and Crosstown Parkway, and both east and west banks between Crosstown Parkway and Vine Street;
- Construct sand-bag coffer dam to facilitate groundwater de-watering between Lake Street and the Upjohn Park footbridge; and
- Construct wood platform working deck on east bank to support contaminated sediment removal and transport operations.

Site Activities - SA6
- Complete construction of new fencing along east and west bank;
- Remove temporary fencing from City of Kalamazoo parking lot;
- Repair asphalt from impacted lots used to access area;
- Complete temporary grass seeding and straw on east and west banks; and
- Replace impacted gravel areas on east bank properties impacted by the 30" discharge pipeline.

Project Management Activities
- Continue weekly progress meetings with City of Kalamazoo.

2.2.1 Anticipated Activities
See POLREP #2

2.2.1.1 Planned Response Activities
See above

2.2.1.2 Next Steps
See above

2.2.2 Issues
Only one post-excavation confirmatory sample result from the second round of excavation in grids in Axtell Creek was under the performance standard of 10 mg/kg. All of the second round of confirmatory sampling results at target dredging depths in the grids were above the performance standard goal of 1 mg/kg as listed below (see table).

GRID	TARGET DEPTH (in)	INITIAL PCB RESULT (mg/kg)	OVERDIG (in)	TOTAL DEPTH (in)	CONFIRMATION PCB RESULT (mg/kg)
AXC-1	24	27.9	12	36	35.8
AXC-2	30	8.9	12	42	14.3
AXC-3	24	16.10	12 (est)	36	19.3
AXC-4	30	18.7	12 (est)	42	22.6
AXC-5	24	4.15	6 (est)	30	3.93

Based on these results, additional core sampling was conducted in Axtell Creek and it was determined that additional PCB contaminated material was at depth which requires excavation. The following table shows the results of the additonal core sampling effort:

GRID	CORE DEPTH (in)	PCB RESULT (mg/kg)
AXC-2-A	0-12	2.33
AXC-2-B	0-12	5.29
AXC-2-C	0-12	14.7
AXC-3-A	0-12	13.7
AXC-3-A	12-16	23.1

AXC-3-B	0-13	3.31
AXC-4-A	0-12	18
AXC-4-B	0-12	0.079
AXC-4-B	12-15	18.2
AXC-4-C	0-12	0.087
AXC-4-D	0-12	8.1
AXC-4-D	12-15	0.049
AXC-5	0-13	8.9
AXC-5B	0-8	0.2

Additional over-excavation will result in increased costs and added expenses for personnel, equipment, transportation, disposal, sampling and backfill material.

2.3 Logistics Section

The current resources present on site during this reporting period include:

- Office trailers
- Portable restrooms and hand-washing stations
- Portable generators
- Submersible pumps
- Equipment storage container
- ERRS work crews and subcontractor work crews
- START sampling contractor
- Heavy equipment
- Water truck
- Street sweeper
- Mixing boxes
- Frac (water) tank
- Pressure wash trailer
- Bypass pumps and piping
- Sheet piling and steel bridge personnel support structures
- Mobile wastewater treatment plant
- Temporary steel bridge

2.4 Finance Section

2.4.1 Narrative

See table

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$5,200,000.00	$3,200,000.00	$2,000,000.00	38.46%
TAT/START	$300,000.00	$200,000.00	$100,000.00	33.33%
Intramural Costs				
Total Site Costs	$5,500,000.00	$3,400,000.00	$2,100,000.00	38.18%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the

government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer
Craig Thomas and Paul Ruesch serve as safety officer(s). The HASP is reviewed and signed by all site personnel. All new personnel are provided a site orientation and safety briefing. Safety meetings are held each morning with all workers.

2.6 Liaison Officer
Craig Thomas and Paul Ruesch serve as liaison(s) with local officials and interested parties.

2.7 Information Officer
See Section 2.6

2.7.1 Public Information Officer
See Section 2.6

2.7.2 Community Involvement Coordinator
Don DeBlasio - U.S. EPA

3. Participating Entities

3.1 Unified Command
N/A

3.2 Cooperating Agencies
U.S. Environmental Protection Agency
Michigan Department of Environmental Quality
Michigan Department of Agriculture and Rural Development
Michigan Department of Natural Resources
U.S. Fish and Wildlife Service
City of Kalamazoo:
- Department of Public Services
- Parks and Recreation Department
- Economic Development Department
- Community Planning & Development
- Public Safety Department
- Fire Department
- Police Department
- ReDevelopment Department

Bronson Methodist Hospital
Kalamazoo Nature Center

4. Personnel On Site

U.S. EPA - 2
ERRS contractor (Environmental Quality Management, Inc) - 14
START contractor (Dynamac/Weston) - 1
Baker Corporation (pump subcontractor) - 2
Rain for Rent (groundwater extraction subcontractor) - 3
Selges Construction (pipeline construction subcontractor) - 3
Farm & Garden (fencing subcontractor) - 3

TOTAL PERSONNEL = 28

5. Definition of Terms

C&D - Construction and Demolition (waste)
ERRS - Emergency and Rapid Response Services
FOSC - Federal On Scene Coordinator
U.S. FWS - United States Fish and Wildlife Service
HASP - Health and Safety Plan
HDPE - High density polyethylene (plastic)
mg/kg - milligrams per kilogram

mg/m3 - milligrams per cubic meter
MDARD - Michigan Department of Agriculture and Rural Development
MDEQ - Michigan Department of Environmental Quality
NA - Not Applicable
NOAA - National Oceanic and Atmospheric Administration
NPL - National Priorities List
NRDA - Natural Resource Damage Assessment
ntu - nephelometric turbidity units
PCB - polychlorinated biphenyl
ppm - parts per million
PRPs - Potentially Responsible Parties
RTK GPS - Real Time Kinematic Global Positioning System
SA - Slope Area
START - Superfund Technical Assessment and Response Team
U.S. EPA - United States Environmental Protection Agency

6. Additional sources of information

6.1 Internet location of additional information/report
See the project website at http://www.epaosc.org/portagecreekarea.

6.2 Reporting Schedule
The next POLREP will be generated in approximately 2 weeks.

7. Situational Reference Materials

See the project website at http://www.epaosc.org/portagecreekarea.

Additional information on the overall Kalamazoo River Project can be found at http://www.epa.gov/Region5/cleanup/kalproject/index.htm.

08/03/2012 17:16

07/31/2012 14:57